



Alan C. Lloyd, PhD
Secretary for
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California Regional Water Quality Control Board

Central Coast Region

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Arnold Schwarzenegger
Governor

December 29, 2005

Mr. Noel King
County of San Luis Obispo
Department of Public Works
Room 207
County Government Center
San Luis Obispo, CA 93401

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Dear Mr. King:

SLIC: LOS OSOS LANDFILL, SAN LUIS OBISPO COUNTY, CALIFORNIA - TECHNICAL REPORT REVIEW

We received your "*Los Osos Landfill Technical Report to Supplement and Update the Site's Amended ROWD*" (Technical Report) on December 1, 2005. The Technical Report was submitted as required in our letter "*Request For Technical Report, Los Osos Landfill, San Luis Obispo County, Waste Discharge Requirements Order No. 94-64*" dated December 15, 2004. Our request for a technical report was made pursuant to the provisions of Section 13267 and 13268 of the California Water Code.

We find the December 1, 2005 Technical Report incomplete and have the following requirements:

1. We find that you have successfully completed the delineation of the volatile organic compounds (VOC) in groundwater downgradient of the Landfill. However, plans for a Corrective Action Program were not included in the Technical Report. We required a recommendation for further action, including additional gas collection wells, if upgrades to the gas collection system did not improve water quality. Additionally, under Title 27, Section 20430, the discharger is required to submit a Corrective Action Program for approval once the nature and extent of the release has been determined. As discussed in the Technical Report, the installation of additional landfill gas extraction wells will probably do little to affect the offsite VOC plume. However, an alternative corrective action or actions were not discussed or considered. A discussion of potential corrective actions, including a preferred corrective action, shall be submitted as outlined below.
2. An updated closure and post closure maintenance plan was not submitted as required in Item 3 of our December 15, 2005 letter. As stated in your Technical Report on Page 5, "...The Post Closure Manual does contain information that is no longer accurate as monitoring and maintenance operations have evolved since the closure." In accordance with California Code of Regulations (CCR), Title 27, Sections 21740, 21750, and 21769, an updated post closure maintenance plan must be submitted. To update the Waste Discharge Requirements (WDR) for the Los Osos Landfill an updated post closure maintenance plan is required. An updated closure and post closure maintenance plan shall be submitted as outlined below.
3. One of the main objectives for reviewing the Los Osos Landfill WDR is to update the groundwater monitoring program. The current monitoring program includes detection monitoring and evaluation monitoring requirements for various wells. However, new wells have been installed and corrective action monitoring is now required for certain wells. A discussion and an


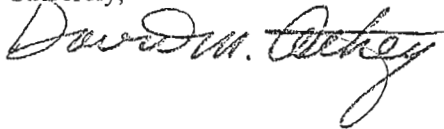
updated groundwater monitoring program is not included in the Technical Report to supplement the June and December 2003 Amended Report of Waste Discharge. Your recommendations for an updated groundwater monitoring program shall be submitted as outlined below.

Water Board staff will not recommend enforcement action if the County of San Luis Obispo submits the required information by June 30, 2006. Failure to comply with this deadline will subject the discharger to enforcement action, including administrative civil liability, based on the original due date for the Technical Report.

We will notify you when your technical report addendum has been reviewed and considered complete. We will then prepare a revised WDR that will be sent to you and interested parties for review and comment. You will be notified of the meeting time and location when the Order is proposed for adoption.

If you have any questions, please contact Thea Tryon (805) 542-4776 or David Athey at (805) 542-4644.

Sincerely,

: Roger W. Briggs
Executive Officer

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cc:

Mr. Jeff Hackett, California Integrated Waste Management Board
Mr. Dean Benedix, Utilities Division Manager, San Luis Obispo County Public Works
Mr. Chris Long, San Luis Obispo County Public Works
Mr. Tom Vercoutere, Golder Associates
Mr. Charles A. Piccuta

